

LEAD TESTING IN SCHOOLS AND CHILD CARE FACILITIES
WORK PLAN FOR THE STATE OF KANSAS



June 24, 2020
Revised August 4, 2020

Summary Statement

The State of Kansas is committed to reducing childhood exposure to lead in drinking water in schools and child care facilities. With the funding appropriated under section 1464(d) of the Safe Drinking Water Act, amended by the Water Infrastructure Improvement Act (WIIN) section 2107, the Kansas Department of Health and Environment (KDHE) in partnership with the Kansas Department of Education plans to establish a lead testing initiative in schools and day care facilities. This initiative prioritizes facilities serving children ages 6 and under, facilities serving low-income populations and older facilities that are more likely to contain lead plumbing.

The State of Kansas will use the U.S. Environmental Protection Agency's (EPA) *3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities* guidance to develop and implement the program. Key components include: 1) Developing a **Communication Plan** that informs the public of the program, shares lead sampling results and provides education on reducing lead exposure; 2) **Training** facility personnel on the risks of lead in drinking water, the importance of testing and developing partnerships with local public water supply system, health departments and appropriate community organizations; 3) **Testing** based on building sampling plan using appropriate testing protocols and a certified laboratory; and 4) **Taking Action** by developing a plan for responding to sampling results and addressing elevated lead where necessary.

KDHE initially received WIIN grant funding in December 2019. KDHE will use the additional funding received under this Work Plan to continue the lead testing in schools and child care facilities established under the original Work Plan.

Scope of Work

This section will discuss the approach the State of Kansas will take to develop and implement the lead testing in schools and child care facilities program and how this program will meet the goal of reducing lead in drinking water exposure in children.

The activities described in this scope of work fall into the following general categories:

- A. Goals and Priorities
- B. Program Implementation Activities
- C. Roles and Responsibilities
- D. Timeline and Milestones
- E. WIIN Programmatic Priorities and EPA's Strategic Plan Linkage
- F. Outputs and Outcomes
- G. Budget Narrative

A. State of Kansas Goals and Priorities

There are approximately 1,630 school buildings, of which approximately 360 will be classified as priority for lead testing, and approximately 678 child care facilities in Kansas. The State of Kansas has identified goals and priorities consistent with the priorities outlined in EPA's State Lead Testing in School and Child Care Program Drinking Water Grant Implementation Document (found here: www.epa.gov/safewater/grants).

The State will assist in voluntary testing for lead contamination in drinking water at schools and child care facilities that are in low-income areas. Facilities that serve greater than 50% of students that qualify for free/reduced lunch receive top priority. In addition to low-income areas, the State will establish priorities based on: facilities that serve children age 0 – 6 years of age, and older facilities that are more likely to contain lead

plumbing. Child care facilities will also be prioritized on factors indicating whether the building may or may not be serving as a child care facility into the future.

It is the State of Kansas goal to reduce lead exposure at these facilities by testing for lead, identifying potential lead sources, and taking mitigation actions. Using the priorities listed above, this testing effort includes the goals of:

1. Testing water at fixtures used for consumption at approximately 130 elementary schools and 240 child care facilities in low-income areas by the end of the project period.
2. Providing education about lead and the importance of testing to all schools and day care facilities.

B. Program Implementation and Activities

The State of Kansas will use a 3rd party vendor to provide “Turn-Key” implementation of the lead testing in schools and child care facilities program. The vendor will be required to follow EPA’s 3Ts guidance (www.epa.gov/safewater/3ts) to implement lead testing in schools and day care facilities. This includes efforts to: 1) Communicate, throughout the implementation of the program, the results and important lead information to the public, parents, teachers, and larger community; 2) Train on the risks of lead in drinking water and testing for lead, as well as developing key partnerships to support the program; 3) Test using appropriate testing protocols and a certified laboratory; and 4) Take Action, including the development of a plan for responding to results of testing conducted and addressing potential elevated lead where necessary. Specific actions included in these key elements:

1. **Communication:** The State of Kansas and its vendor will establish key partnerships to support the program as well as keeping the public informed. Timely dissemination of information is critical to the success of the program. Therefore, information about the program will be shared with the public before water sampling begins, after the sampling results are available, and corrective actions planned/taken (if needed) based on the analytical results. The following actions are the foundation of the communications plan:
 - a. Notifications will occur at least 30 days prior to testing at that facility.
 - b. Testing results will be shared with the school or child care community as soon as possible, but no later than 2 weeks following the receipt of the final results.
 - c. Press releases and public meetings will be held, in collaboration with school and child care program leaders, at least once a year.
 - d. General public education and updates to the testing will be posted on a website will be made on an ongoing basis.

The 3rd party vendor in conjunction with the State of Kansas will use multiple methods to communicate program activities and information to the target audiences (parents, teachers and staff) and the general public including: press releases, newsletters, presentations and social media and websites. In addition, schools and child care facilities will make testing results and other program information available in the administrative offices, public website, and newsletters.

2. **Training:** Training will include education on the risks of lead in drinking water and testing in school buildings and day care facilities. Training will include the causes and health effects of lead in drinking water as well as training on program plan and sampling procedures. Resources and materials will be posted on a designated website for the lead testing in schools and day care facilities program website.

The State will use the 3rd party vendor to develop training and education materials to reach the target audience and the general public.

3. **Testing:** The 3rd party vendor will use EPA's 3 T's guidance sampling protocols. All samples will be analyzed at a laboratory certified to test lead in drinking water. The 3rd party vendor will work with schools and day care facilities to: conduct building assessments, develop sampling plans and collect initial and follow-up samples. All sampling efforts will be coded and recorded using the coding system and recordkeeping recommendations identified in EPA's 3T's guidance. The selected vendor will be required to comply with *KDHE's Quality Assurance Management Plan*, which has been approved by EPA.
4. **Taking Action:** The Kansas 3rd party vendor will work with schools and child care facilities to develop a plan for responding to results of testing conducted and addressing potential elevated lead where necessary. The plans developed will follow remediation recommendations in the 3Ts guidance. Sample sites with results above the action level of 15 parts per billion (ppb) will be included in remediation plans. Sampling will also be conducted post-remediation to ensure efforts to reduce lead levels were effective.

C. Roles and Responsibilities:

The 3rd party vendor selected by the State of Kansas will have primary responsibility for all aspects of implementation for the lead testing in schools and day care facilities program. The State of Kansas will provide contract oversight and ensure vendor compliance with all State and EPA grant requirements.

The State of Kansas Project Team includes:

1. Kansas Department of Health and Environment:
 - Public Water Supply Section
 - General Program Management – Cathy Tucker-Vogel
 - Contract Management – William Carr
 - Technical Oversight – Rob Gavin
 - Communications – Kristi Pankratz
 - Child Care Licensing
 - Bureau of Epidemiology and Public Health Informatics
 - Health and Environmental Laboratories
2. Kansas Department of Education
3. Other Potential Program Partners:
 - Local School Districts
 - County Health Departments

D. Timeline and Milestones:

The funding provided under the FFY 2020 grant will continue the monitoring and sampling program initiated under the original WIIN grant.

- **FFY2021 Quarter 1:** Vendor will conduct initial sampling at participating schools and child care facilities, share results of testing as soon as possible but no later than two weeks after receipt of results, take action where elevated lead levels are identified, support schools and child care programs with community outreach, and conduct follow-up sampling where needed.
- **FFY2022 Quarter 2** Vendor will conduct initial sampling at participating schools and child care facilities, share results of testing as soon as possible but no later than two weeks after receipt of results, take action where elevated lead levels are identified, support schools and child care programs with community outreach, and conduct follow-up sampling where needed. Vendor will

inform participants of actions that can be taken to protect/improve water quality at closed facilities or facilities with reduced hours during the summer months.

- **FFY2021 Quarter 3:** Vendor will conduct initial sampling at participating schools and child care facilities, share results of testing as soon as possible but no later than two weeks after receipt of results, take action where elevated lead levels are identified, support schools and child care programs with community outreach, and conduct follow-up sampling where needed. Vendor will inform participants of actions that can be taken to protect/improve water quality at closed facilities or facilities with reduced hours during the summer months.
- **FFY2021 Quarter 4:** Prepare and submit Final Program Report within 90 days of project completion.

E. WIIN Programmatic Priorities and The EPA's Strategic Plan Linkage

The activities described in the workplan support the WIIN Programmatic Priorities and The EPA's FY 2018-22 Strategic Plan, **Goal 1, "A Cleaner, Healthier Environment** - Deliver a cleaner, safer, and healthier environment for all Americans and future generations by carrying out the Agency's core mission, **"Objective 1.2, "Provide for Clean and Safe Water:** Ensure waters are clean through improved water infrastructure and, in partnership with states and tribes, sustainably manage programs to support drinking water, aquatic ecosystems, and recreational, economic, and subsistence activities."

F. Anticipated Outputs and Outcomes

Outputs and outcomes expected to be achieved under the agreement are described below.

Outputs for this project include: 1) Obtain the services of a 3rd party vendor to provide "Turn-Key" implementation for lead testing in schools and child care facilities; 2) Use the EPA's 3T's for Reducing Lead in Drinking Water guidance to implement the state program; 3) Development of a state lead testing in drinking water in schools and child care facilities management strategy that supports a robust training, monitoring, and maintenance plan that protects children from lead exposure now and in the future; 4) Providing results of any voluntary testing for lead contamination in school and child care facility drinking water carried out using grant funds and notifying parents, teachers, and organizations of the availability of the results; 5) Prioritization of testing to target vulnerable communities and populations: schools and child care programs in underserved and/or low-income communities; elementary and child care programs that primarily care for children 6 years and under; an older facilities that are more likely to contain lead plumbing; 6) Developing a regular testing program under the Initiative; and 7) Establishment of routine practices such as those outlined in the 3Ts guidance.

Outcomes for this project include: 1) Schools or child care programs implementing a testing program and mitigating lead exposure by utilizing the 3Ts toolkit in determining best action to take for remediation; 2) The reduction of children's exposure to lead in drinking water; 3) Improvement of staff and community knowledge on lead in drinking water and other environmental harms; and 5) Water quality improvement and lead exposure reduction in drinking water; and 6) Establishment of routing practices such as those outlined in the 3Ts guidance.

Other outcomes include: 1) Fostering sustainable partnerships at the state and local level to allow for a more efficient use of resources and the exchange of information among experts in various area of school, child care, utility, and health sectors; 2) The enhancement of community, parent, and teacher trust; and 3) Establishment of state contract that can be used by local school districts if EPA grant funding is not available.